



HON. SYLVIA O. HINDS-RADIX  
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October 21, 2022

**VIA ECF**

Hon. Mary Kay Vyskocil  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, New York 10007

*Re:* F.N. v. N.Y.C. Dep't of Educ., 21-cv-11177 (MKV)(GWG)

Dear Judge Vyskocil:

I am a Special Assistant Corporation Counsel in the office of Corporation Counsel, the Hon. Sylvia O. Hinds-Radix, attorney for Defendant in the above-referenced action, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.* ("IDEA"), as well as for this action.

I write to respectfully request a 14-day extension of Defendant's time to respond to Plaintiff's Motion for Summary Judgment (ECF No. 28), from November 1 to November 15, 2022. Plaintiff consents to this request. This is the first request for an extension to reply to Plaintiff's Motion. The requested extension will give the undersigned Defendant's counsel—assigned to this case on October 20, 2022—the necessary time to review Plaintiff's submissions and respond appropriately.

Accordingly, Defendant respectfully requests that Defendant's time to respond to Plaintiff's Motion for Summary Judgment be extended to November 15, 2022.

Thank you for considering this request.

Respectfully submitted,  
Jason Imbiano

/s/ Jason Imbiano  
Special Assistant Corporation Counsel

cc: Kevin Mendillo (via ECF)